

ROBERT WISNIEWSKI P.C.
ATTORNEYS-AT-LAW

40 WALL STREET, SUITE 2833 • NEW YORK, NY 10005
TEL: (212) 267-2101 • FAX: (646) 512-5604
WEBSITE: www.rwapc.com

February 10, 2020

Hon. Katherine Polk Failla, USDJ
United States District Court
for the Southern District of New York
40 Foley Square
New York, New York 10007
VIA ECF

MEMO ENDORSED

Re: Williams et al v. Movage, Inc. et al
Docket No.: 17-cv-02628-KPF

Dear Judge Failla,

I am co-counsel for Plaintiffs in the above-captioned action. I submit this joint status report as well as a concomitant motion to extend the time for the parties to file a ***Cheeks*** motion in this collective FLSA case until March 9, 2020. This is the first request of its kind and there is no prejudice to any party.

The parties have chosen to settle the matter on the financial terms previously reported to Your Honor. However, having taken a cue from the last status conference, Defendants wished to line up proper financing before committing to a settlement that calls for one lump sum payment. Defense counsel advised us recently that such financing has been secured and undertook to draft the settlement agreement. Defense counsel has transmitted the first draft of the settlement agreement, and my co-counsel and I will revert to him within a few days. We expect to have a final version of the document within the next two weeks. After that we will need another two weeks to make sure that all parties, including eight Plaintiffs, sign the document. Hence the need for one month's extension.

Consequently, we respectfully request that Your Honor grant an extension of time for the parties to submit a ***Cheeks*** motion from today to March 9, 2020.

Thank you for your attention to the foregoing.

Respectfully submitted,

/s/Robert Wisniewski
Robert Wisniewski

cc: (via ECF)
Joshua Lurie
Eugene Strupinsky
Counsel for Defendants

Application GRANTED. The parties have until March 9, 2020, to submit a proposed settlement for approval pursuant to *Cheeks*.

Dated: February 10, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE